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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3:15-cr-00438-JO**

**v.**

**WINSTON SHROUT,**

**Defendant.**

**MOTION FOR LEAVE TO FILE  
EXHIBIT TO OPPOSITION TO  
DEFENDANT'S MOTION TO REDUCE  
SENTENCE UNDER SEAL**

The United States of America, by and through Billy J. Williams, United States Attorney for the District of Oregon, and Stuart A. Wexler and Lee F. Langston, Trial Attorneys, Tax Division, respectfully moves the Court for leave to file Exhibit A to Government's Opposition to Defendant's Motion to Reduce Sentence under seal because it contains personal and confidential information that should not be filed in the public record.

Dated: June 5, 2020

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

/s/ Stuart A. Wexler  
STUART A. WEXLER  
LEE F. LANGSTON  
Trial Attorneys, Tax Division  
202-353-0036

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 5, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of record for the defendant.

/s/ Stuart A. Wexler

STUART A. WEXLER  
Trial Attorney, Tax Division